

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA	X	
	:	
-against-	:	
	:	Hon. Jed S. Rakoff
	:	
MONZER AL KASSAR,	:	S3 07 Cr. 354 (JSR)
TAREQ MOUSA AL GHAZI, and	:	
LUIS FELIPE MORENO GODOY	:	
	:	
Defendants.	:	
	X	

**AFFIDAVIT OF IRA LEE SORKIN IN SUPPORT OF  
DEFENDANTS' MOTION FOR RULE 15 DEPOSITIONS**

IRA LEE SORKIN, being duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law in the State of New York and I am a partner in the law firm of Dickstein Shapiro, LLP, 1177 Avenue of the Americas, New York, New York 10036.
2. I make this Affidavit in support of Defendants' Motion for Rule 15 Depositions.
3. Earlier this month, I met in Spain with each of the following individuals: Jose Villarejo, Assuman Munyantore, and Juan Manuel Rodriguez.
4. Mr. Villarejo lives and works in Madrid, Spain.
5. Mr. Villarejo works in the Madrid Police Department.
6. Mr. Villarejo represented that, given his work obligations, he is unwilling and unable to travel to New York to testify at trial.
7. Mr. Munyantore lives and works in Marbella, Spain.
8. Mr. Munyantore worked as Mr. Al Kassar's personal assistant.

9. Mr. Munyantore represented that he is unwilling and unable to travel to New York to testify at trial.

10. Mr. Rodriguez lives and works in Marbella, Spain.

11. Mr. Rodriguez worked as Mr. Al Kassar's attorney.

12. Mr. Rodriguez represented that he is unwilling and unable to travel to New York to testify at trial.


13. Messrs. Villarejo, Munyantore, and Rodriguez all communicated regularly with Defendants during the timeframe relevant to the Indictment.

14. Messrs. Villarejo, Munyantore, and Rodriguez are all material to the Defendants' ability to defend against the charges in the Indictment.

15. Each Defendant will waive in writing, pursuant to Rule 15(c) of the Federal Rules of Criminal Procedure, the right to be present at the depositions.

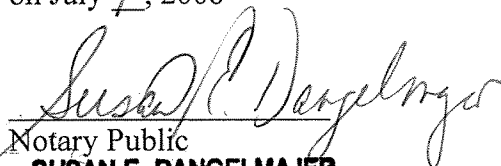
Respectfully submitted,

By:



Ira Lee Sorkin  
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*Attorneys for Monzer Al Kassar*

Sworn to before me  
on July 7, 2008



Notary Public  
**SUSAN E. DANGELMAJER**  
Notary Public, State of New York  
No. 01E86071856  
Qualified in New York County  
Commission Expires March 25, 2010